

**REMARKS**

Applicants request reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1, 3, and 25 are pending in the present application. Claims 1, 3, and 25 are the independent claims.

Claims 1, 3, and 25 have been amended. No new matter is believed to have been added.

Claims 1 and 3 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,540,337 (Pollard). Claim 25 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Pollard in view of U.S. Patent No. 6,561,632 (Feinn et al.). All rejections are respectfully traversed.

Independent claim 1 recites, inter alia, a second trench formed at a second surface of the substrate in a second pattern, having an area equal to or smaller than that of the first trench in the range of the first pattern of the first trench, having a uniform width, penetrating the substrate and directly connected to the first trench.

Independent claim 3 recites, inter alia, a second trench formed at a second surface of the substrate in a second pattern, having an area equal to or smaller than that of the first trench in the range of the first pattern of the first trench, having a uniform width, penetrating the substrate and directly connected to the first trench.

Independent claim 25 recites, inter alia, a second trench formed at a second surface of the substrate in a second pattern, having an area equal to or area smaller than that of the first trench in the range of the first pattern of the first trench, having a uniform width, penetrating the substrate and directly connected to the first trench.

Applicants submit that neither Pollard nor Feinn et al. teach or suggest at least the aforementioned features of independent claims 1, 3, and 25. Accordingly, without conceding the propriety of the asserted combination, the asserted combination is likewise deficient, even in view of the knowledge of one of ordinary skill in the art.

By at least the aforementioned features, the process of supplying ink may be facilitated and the etching process may be simplified. As a result, increased utility, enhanced performance, and economies of manufacture may be realized.

The Office Action contends that elements 805p and 805q of FIG. 8a of Pollard are a second trench. (Office Action, pages 4 and 5).

Even assuming arguendo that this characterization of Pollard is correct, a review of FIG. 8a reveals that the alleged second trench does not have a uniform width and penetrate the substrate. Thus, elements 805p and 805q do not meet the aforementioned features of independent claims 1 and 3.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1 and 3 under 35 U.S.C. § 102 are respectfully requested.

Regarding the rejection of claim 25, the secondary citation to Feinn et al. is cited for its alleged disclosure of a protective layer for on a heater. (Office Action, page 6). Applicants submit that Feinn et al. does not add anything that would remedy the aforementioned deficiency in the disclosure of Pollard.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claim 25 under 35 U.S.C. § 103 are respectfully requested.

In view of the foregoing, Applicant respectfully submits that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

Applicants believe that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to such matters.

Applicants submit that this Amendment After Final Rejection clearly places the subject application in condition for allowance. This Amendment was not earlier presented because Applicants believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of the instant Amendment as an earnest attempt to advance prosecution and reduce the number of issues is requested under 37 C.F.R. § 1.116.

There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously solicited.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: Michael E. Kondoudis  
Michael E. Kondoudis  
Registration No. 42,758

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501